

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
CRYSTAL M. CONRAD	:	CASE NO. 1-20-03513-HWV
aka CRYSTAL M. RILEY	:	
EUGENE CHARLES CONRAD, JR.	:	CHAPTER 13
aka EUGENE C. CONRAD	:	
aka CHIP CONRAD	:	
Debtors	:	
	:	
ALLY BANK	:	
Movant	:	
	:	
v.	:	
	:	
CRYSTAL M. CONRAD	:	
aka CRYSTAL M. RILEY	:	
EUGENE CHARLES CONRAD, JR.	:	
aka EUGENE C. CONRAD	:	
aka CHIP CONRAD	:	
Respondents	:	

**DEBTORS' RESPONSE TO MOTION OF ALLY BANK
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, Crystal M. Conrad and Eugene Charles Conrad, Jr., by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.
2. Admitted.
3. Admitted in part and denied in part. The Sales Contract speaks for itself. Strict proof is demanded.
4. Admitted in part and denied in part. Whether the Contract is secured by the vehicle is a question of law. Strict proof is demanded.

5. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded as to the Assignment.

6. Admitted in part and denied in part. The Contract speaks for itself. Strict proof is demanded.

7. Admitted in part and denied in part. Debtors made a payment of \$597.02 on July 30, 2021. Otherwise, Debtors agree to the amount of the arrearage. Debtors offer to pay the arrearage through an Amended Plan.

8. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.

9. Admitted in part and denied in part. The records speak for themselves. Strict proof is demanded.

10. Admitted.

11. Denied. By Movant's own admission, there is a significant equity cushion. There is no reason why Rule 4001(a)(3) should not apply.

12. Admitted in part and denied in part. Strict proof is demanded.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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DATED: 9/9/11

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF ALLY BANK FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

JASON BRETT SCHWARTZ, ESQUIRE
MESTER & SCHWARTZ, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

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DATED: 8/9/2021